



California Stormwater Quality Association®

Dedicated to the Advancement of Stormwater Quality Management, Science and Regulation

July 20, 2011

Mr. Tom Howard
Executive Officer
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-0100

Subject: Stormwater NPDES Permit Structure and Process to Improve Permitting

Dear Tom:

The municipal stormwater permitting process continues to present technical, administrative, and fiscal challenges for our municipal members. The five-year permitting cycles occur on differing schedules for municipalities throughout the State. The Report of Waste Discharge (ROWD), draft and tentative order process, and adoption timelines vary widely from Region to Region, including the time provided for discussion of the provisions of the Tentative Order prior to public release. Additionally, permit requirements tend to be more diverse across the Regions than warranted, reducing the ability of municipal programs to coordinate and to leverage resources, and increasing the individual overhead expended during the reissuance process.

We are interested in working with Water Board staff on improving the permitting process, including establishing a set of guidelines for the NPDES permit process and exploring the potential benefits of a single statewide municipal stormwater permit. We propose that a small working group be established to consider these questions. The working group would include Board staff of your selection as well as a subgroup of the CASQA Board of Directors. Meeting frequency and location would be determined by the working group.

We appreciate your continued assistance and interest in working with us to improve the stormwater program. We will contact you in the near future to discuss our proposal further. In the meantime, please feel free to contact me at 760 603 6242, or our Executive Director Geoff Brosseau at 650 365 8620 if you have any questions.

Sincerely,

Scott Taylor, P.E., D. WRE
Chair